REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed March 2, 2005. Upon entry of the amendments in this response, claims 1 – 4, 7, 9, 10, 12, 21 – 28 and 33 - 35 remain pending. In particular, Applicants have added claims 33 - 35, have amended claims 1 - 4, 7, 9, 12 and 21, and have canceled claims 5, 6, 8, 11, 13 – 20 and 29 - 32 without prejudice, waiver, or disclaimer. Applicants have canceled claims 5, 6, 8, 11, 13 – 20 and 29 - 32 merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Applicants reserve the right to pursue the subject matter of these canceled claims in a continuing application, if Applicants so choose, and do not intend to dedicate the canceled subject matter to the public. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

Rejections Under 35 U.S.C. §112

The Office Action indicates that claims 6 and 31 stand objected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which application regards as the invention. As set forth above, Applicants have canceled claims 6 and 31 and respectfully assert that the rejection has been rendered moot.

Rejections Under 35 U.S.C. §102

The Office Action indicates that claims 1 - 32 stand rejected under 35 U.S.C. §102(e) as being anticipated by *Kowtko*. Applicants respectfully traverse the rejection.

In this regard, *Kowtko* generally relates to methods and systems for creating and

sharing customized web sites and portals. In particular, *Kowtko* discloses:

> FIG. 3 is a representation of a browser display 300 showing the control
> panel 302 for creating customized browser-based demos, Web sites or
> customized portals (gateways to other locations on the World Wide Web),
> according to another embodiment of the present invention. The customized
> Web sites may include intranet portals, extranet portals and/or application
> portals, for example. As shown therein, the control panel 302 includes input
> fields for a plurality of customizable attributes 304.sub.1 to 304.sub.10. It is to
> be understood that, although an arbitrary ten such customizable attributes
> 304.sub.1-304.sub.10 are shown for illustrative purposes in FIG. 3, any
> number of such customizable attributes may be provided in the control panel
> 302. Inputting values, graphics, text and/or other configuration information
> into the input fields of the customizable attributes 304.sub.1-304.sub.10
> enables the customization of one or more selected generic Web site or portal
> templates. *According to the present invention, these generic Web site or*
> *portal templates may be stored in a database (such as shown at 408 in FIG.*
> *4), and thereafter selectively retrieved therefrom and customized by means*
> *of the customizable attributes 304.sub.1-304.sub.10.*

> According to the present invention, the values, graphics, text and/or
> other configuration information inputted into the customizable attributes fields
> 304.sub.1-304.sub.10 may be advantageously (but need not be) retrieved
> directly from the potential customer's own Web site. *Indeed, these values, text*
> *and/or other configuration information (such as fonts, colors, animation,*
> *graphics, navigation bars, textures, etc.), for example, may be cut and pasted*
> *from the potential customer's own Web site and inputted directly into*
> *appropriate ones of the fields of the customizable attributes 304.sub.1-*
> *304.sub.10 within the control panel 302.* Thereafter, the selected generic Web
> site or portal template may be customized to the "look and feel" of the
> potential customer's existing Web site (for example) by re-generating the
> selected generic Web site or portal template with the values, text and/or other
> configuration information included therein. The customized portal or Web site
> may then be posted (to a Web collaboration tool, for example) and made
> available to the potential customer. Then end result is that a customized portal
> or Web site may be created in a short period of time (even while the potential
> customer is on the telephone with the sales rep) that resembles the look and
> feel or corporate identity of the potential customer's own Web site.

(Kowtko, paragraphs [0025] and [0026]). (Emphasis Added).

As set forth in the exemplary teaching of *Kowtko* above, that reference involves a user

copying and pasting image information into a template that is then posted for access to a

potential customer. However, the system and method of *Kowtko* are patentably distinct from the limitations recited in Applicants claims as will be described in detail below.

In this regard, claim 1 has been amended to recite:

> 1.   A method for transferring imaging information, comprising:
> ***using a network browser operating on a network-connected computing device to:***
> > access image data stored on a remote-data server;
> > arrange the image data to form a composition in which relative positional relationships of the image data are defined, wherein the composition is stored at a remote-data server;
> > ***access an imaging-destination service implemented by a network server;*** and
> > ***request the imaging-destination service to perform a service with respect to the composition such that the imaging-destination service accesses the composition stored at the remote-data server to retrieve the image data for performing the service requested.***

(Emphasis Added).

Applicants respectfully assert that the cited art is legally deficient for the purpose of rendering claim 1 unpatentable. In particular, Applicants respectfully assert that *Kowtko* does not teach or otherwise disclose at least the features/limitations emphasized above in claim 1. Specifically, in contrast to *Kowtko*, which involves copying and pasting image data into a template that is then posted as a modified website, Applicants' claim 1 recites "using a network browser operating on a network-connected computing device to . . . request the imaging-destination service to perform a service with respect to the composition such that the imaging-destination service accesses the composition stored at the remote-data server to retrieve the image data for performing the service requested." As this limitation is not disclosed by *Kowtko*, either expressly or inherently, Applicants respectfully assert, therefore, that claim 1 is in condition for allowance.

Since claims 2 – 4 and 33 - 35 are dependent claims that incorporate all the features/limitations of claim 1, Applicants respectfully assert that these claims also are in

condition for allowance. Additionally, these claims recite other features/limitations that can serve as an independent basis for patentability.

With respect to claim 7, that claim has been amended to recite:

> 7. A method for adding imaging information to a service, comprising:
> receiving a composition via a network browser;
> *responsive to receiving the composition via the network browser, automatically identifying component images comprising the composition*;
> copying the identified component images of the composition; and
> *storing the component images to a data server, wherein the component images stored are individually accessible via the network browser.*

(Emphasis Added).

Applicants respectfully assert that the cited art is legally deficient for the purpose of rendering claim 7 unpatentable. In particular, Applicants respectfully assert that *Kowtko* does not teach or otherwise disclose at least the features/limitations emphasized above in claim 7. Specifically, in contrast to *Kowtko*, which involves copying and pasting image data into a template that is then posted as a modified website, Applicants' claim 7 recites "responsive to receiving the composition via the network browser, automatically identifying component images comprising the composition" and "storing the component images to a data server, wherein the component images stored are individually accessible via the network browser." As these limitations are not disclosed by *Kowtko*, either expressly or inherently, Applicants respectfully assert, therefore, that claim 7 is in condition for allowance.

Since claims 9, 10 and 12 are dependent claims that incorporate all the features/limitations of claim 7, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features/limitations that can serve as an independent basis for patentability.

With respect to claim 21, that claim has been amended to recite:

> 21.   A system for transferring image information, comprising:
> a server containing imaging-service content, the server coupled to a network, the imaging-service content comprising a composition; and
> a computing device coupled to the network, the computing device configured with a browser, wherein the browser is configured to:
> receive the imaging-service content;
> ***extract data reflective of the composition***;
> access an imaging-destination service implemented by a network server; and
> ***request the imaging-destination service to perform a service with respect to the composition such that the imaging-destination service retrieves the composition for performing the service requested.***

(Emphasis Added).

Applicants respectfully assert that the cited art is legally deficient for the purpose of rendering claim 21 unpatentable. In particular, Applicants respectfully assert that *Kowtko* does not teach or otherwise disclose at least the features/limitations emphasized above in claim 21. Specifically, in contrast to *Kowtko*, which involves copying and pasting image data into a template that is then posted as a modified website, Applicants' claim 21 recites "wherein the browser is configured to . . . extract data reflective of the composition" and "request the imaging-destination service to perform a service with respect to the composition such that the imaging-destination service retrieves the composition for performing the service requested." As these limitations are not disclosed by *Kowtko*, either expressly or inherently, Applicants respectfully assert, therefore, that claim 21 is in condition for allowance.

Since claims 22 - 28 are dependent claims that incorporate all the features/limitations of claim 21, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features/limitations that can serve as an independent basis for patentability.

Newly Added Claims

Upon entry of the amendments in this response, Applicants have added claims 33 – 35. Applicants respectfully assert that these claims are in condition for allowance because these claims are dependent claims that incorporate all the features/limitations of claim 1. Additionally, these claims recite other features/limitations that can serve as an independent basis for patentability. By way of example, claim 33 recites:

> 33. The method of claim 1, wherein the network browser is operative to access a user profile defining access to a subset of the image data.

Applicants respectfully assert that the cited art is legally deficient for the purpose of rendering claim 33 unpatentable, because at least these additional features/limitations are not taught or reasonably suggested by the cited art. Therefore, Applicants respectfully assert that claim 33 clearly is in condition for allowance.

By way of further example, claim 34 recites:

> 34. The method of claim 33, wherein:
> the user profile is one of multiple user profiles provided for a specified user of the network browser; and
> each of the user profiles defines access to a different subset of the image data.

Applicants respectfully assert that the cited art is legally deficient for the purpose of rendering claim 34 unpatentable, because at least these additional features/limitations are not taught or reasonably suggested by the cited art. Therefore, Applicants respectfully assert that claim 34 also clearly is in condition for allowance. Notably, support for these limitations can be found at paragraphs [0048] – [0050], for example. Thus, no new matter has been added.

Cited Art Made of Record

The cited art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above,

Applicants respectfully submit that all objections and/or rejections have been traversed,

rendered moot, and/or accommodated, and that the now pending claims are in condition for

allowance. Favorable reconsideration and allowance of the present application and all

pending claims are hereby courteously requested. If, in the opinion of the Examiner, a

telephonic conference would expedite the examination of this matter, the Examiner is invited to

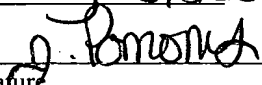call the undersigned attorney at (770) 933-9500.

Respectfully submitted,

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